# CYCLE II EXTERNAL ENVIRONMENTAL COMPLIANCE ASSESSMENT PRELIMINARY FINDINGS REPORT

NORTH SPRINGFIELD LAKE NORTH SPRINGFIELD, VERMONT

U.S. Army Corps of Engineers New England District 424 Trapelo Road Waltham, Massachusetts 02254-9149

**July 1997** 



US Army Corps of Engineers.

**New England District** 

For Inter Corps Distribution Only

MEMORANDUM FOR Environmental Compliance Coordinator, NAE

SUBJECT: Environmental Compliance Assessment of North Springfield Lake

- 1. Attached please find the Cycle II Preliminary Findings Report for the environmental compliance assessment conducted at North Springfield Lake on 8 April 1997.
- 2. A draft report was prepared and furnished to the Basin and Project Managers for comment on 12 June 1997. Their comments have been incorporated into the final report.
- 3. I recommend your approval for implementation.

Encl

Operations Technical Support Section

#### CMT 2

1. Environmental Compliance Assessment of North Springfield Lake is:

Approved  $\lambda$  Disapproved for implementation as stated.

Bruce Williams, ECC Operations Technical Support Section

#### **EXECUTIVE SUMMARY**

An environmental compliance assessment of North Springfield Lake was conducted by a team of New England District environmental professionals on 8 April 1997. This was a Cycle II External Assessment. The Cycle I External Assessment was conducted on 6 May 1993.

The assessment was conducted as part of the U.S. Army Corps of Engineers Environmental Review Guide for Operations (ERGO) program. The ERGO program, developed by the U.S. Army establishes the use of environmental compliance assessments to ensure compliance with all applicable Federal, state, local, Department of Defense, and U.S. Army environmental laws and regulations.

A comprehensive ERGO assessment considers 13 major environmental compliance categories. For each category, Federal, State and local laws, Department of Defense and U.S. Army Corps of Engineers regulations, and good management practices are reviewed.

Overall the project was well maintained. The summary of deficiencies at North Springfield Lake is as follows:

#### Significant Deficiencies - 0

Problems that pose a direct and immediate threat to human health, safety, the environment or the facility's mission, and require immediate attention.

#### Major Deficiencies - 1

Problems that require action, but not necessarily immediate action, and pose a threat to human health, safety or the environment.

#### Minor Deficiencies - 8

Deficiencies that are usually administrative in nature. These problems require monitoring or planning for future mitigation.

#### **Management Practice - 1**

Items noted are not specifically covered by a distinctive regulatory requirement; however, they still require management attention.

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#### THE ERGO PROGRAM

The U.S. Army Corps of Engineers initiated the Environmental Review Guide for Operations (ERGO) program as a comprehensive self-evaluation and program management system for achieving, maintaining, and monitoring compliance with environmental laws and regulations at Corps of Engineers projects and facilities. Objectives of the ERGO program are to:

- 1) Enhance Corps of Engineers environmental compliance at Federal, State and local levels.
- 2) Improve Corps of Engineers environmental management.
- 3) Build supporting financial programs and budgets.
- 4) Assure supervisors that their environmental programs are being implemented effectively in accordance with Corps of Engineers goals and objectives.

Periodic environmental compliance assessments have been deemed necessary. These evaluations are designed to assess environmental compliance and provide necessary feedback to Project Managers for organizing, directing, and controlling environmental compliance and protection activities.

New England District's (NAE's) ERGO program became operational in 1991. Because it is responsible for the majority of USACE facilities, Construction/Operations Directorate is tasked with the development and implementation of the ERGO program. Every five years, each NAE project undergoes an external environmental compliance assessment. This assessment is conducted by a team of environmental professionals. Every NAE project has already had one external environmental compliance assessment. The assessment described in this report is the second external assessment for these projects, and is therefore known as a Cycle II External Environmental Compliance Assessment. The projects themselves are responsible for performing an internal self-assessment annually, with the exception of those years when an external assessment is being completed.

#### ASSESSMENT PROCEDURES

The ERGO assessment of North Springfield Lake was conducted by an eight person team comprised of NAE personnel, and took place on 8 April 1997. The team followed a three phase approach. The first phase was to obtain pre-assessment information concerning its on-site activities (see Appendix A - Previsit Questionnaires) and research applicable Federal, State and local environmental regulations. This culminated in the development of site/facility-specific categories. In addition, a list of environmental compliance issues identified by the ERGO Program Manager as areas of special emphasis was distributed to the Project Manager prior to the on-site visit (see Appendix B - Special Emphasis Areas List).

The second phase involved the on-site portion of the assessment. This involved an interview with project staff, followed by a facility tour, including major outgrants, to obtain a general overview of the facility operations. Typically, the Project Manager briefed the ERGO team on compliance with the special emphasis areas list and initiated discussion concerning any further compliance issues. Once the initial interview with with project staff concluded, the ERGO team visited areas of the facility deemed necessary. When possible, all deficiencies were reported to facility personnel. The team concluded the on-site portion of the assessment by briefing the project staff to apprise them of the review team's preliminary findings.

The third phase involves writing a draft report and developing an action plan for addressing outstanding deficiencies. The evaluation of North Springfield Lake followed the above procedures and covered the elements set forth in the 13 ERGO compliance categories.

The assessment was conducted in accordance with the best professional judgement of the ERGO team members. It should be understood that the assessment is based on observations taken over a short span of time relative to the period under review. Efforts were directed toward reviewing major facets of environmental performance in the period covered and, therefore, it is important to recognize that this assessment may not necessarily identify all potential problems.

Successful completion of the site-specific environmental evaluation of North Springfield Lake was dependent on complete disclosure by project staff and outgrantees of all information regarding the operation and maintenance activities at the project. It should be noted that failure of a manager to provide complete or adequate information to the review team does not relieve the manager of the responsibility for compliance with environmental regulations.

#### **ERGO PROGRAM OBJECTIVES**

The Environmental Review Guide for Operations (ERGO) program guidance is embodied primarily in two publications: The Environmental Assessment and Management (TEAM) Guide, applicable to participating DoD components, including the U.S. Army Corps of Engineers (USACE), and the Supplement to The Environmental Assessment and Management (TEAM) Guide, applicable to Corps of Engineers Civil Works activities, operating projects and floating plant, including outgranted lands and concessions. In addition, state-specific supplements are available for some states.

#### Objectives of the TEAM Guide are as follows:

- 1. Compile applicable Federal regulations with DoD component operations and activities.
- 2. Synthesize environmental regulations, management practices, and risk management issues into consistent and easy to use checklists.
- 3. Serve as an aid in the assessment process and management action development phases of DoD component environmental assessment programs.

## Objectives of the Supplement to the TEAM Guide are as follows:

- 1. Compile applicable DoD regulations, and Engineer Regulations (ERs) associated with USACE operations and activities.
- 2. Synthesize regulations, management practices, and risk management issues into consistent and easy-to-use checklists.
- 3. Serve as a reference document and educational tool for daily operations.
- 4. Serve as a guide for implementing the U.S. Army Environmental Strategy Into the 21<sup>st</sup> Century, which emphasizes environmental stewardship as an integral of everything the USACE does.

#### DESCRIPTION OF REGULATORY COMPLIANCE

This section of the report presents a description of finding categories that are governed by engineering regulations, engineering manuals, and Federal, state, and local regulations. Non-regulatory items, which are referred to in this report as management practices, are of a lower priority but require attention to correct.

Deficiencies noted in this evaluation will be categorized as follows:

#### SIGNIFICANT DEFICIENCY:

A problem categorized as significant requires immediate attention. It poses, or has a high likelihood to pose, a direct and immediate threat to human health, safety, the environment, or the facility's mission.

#### MAJOR DEFICIENCY:

A major deficiency requires action, but not necessarily immediate action. Major deficiencies may pose a threat to human health, safety or the environment. Any immediate threat, however, must be categorized as significant.

#### MINOR DEFICIENCY:

Minor deficiencies are usually administrative in nature, even though those findings might possibly result in a notice of violation. This category may also include temporary or occasional instances of non-compliance.

#### MANAGEMENT PRACTICE:

Management practice items are those for which there is no specific regulatory requirement; however they still require management attention.

## SUMMARY OF DEFICIENCIES BY CATEGORY

## North Springfield Lake

ERGO Compliance Categories	Findings			
	Significant	Major	Minor	Management Practice
Air Emissions Management	0	0	0	0
Cultural Resources Management	0	0	2	0
Hazardous Materials Management	0	0	0	0
Hazardous Waste Management	0	0	0	0
Natural Resources Management	0	1	4	1
Other Environmental Issues	0	0	1	0
Pesticide Management	0	0	0	0
POL Management	0	0	0	0
Solid Waste Management	0	0	0	0
Storage Tank Management	0	0	0	0
Toxic Substances Management	0	0	1	0
Wastewater Management	0	0	0	0
Water Quality Management	0	0	0	0
Totals	0	11	8	1

## AIR EMISSIONS MANAGEMENT

## CULTURAL RESOURCES MANAGEMENT

#### Cultural Resources Management

Narrative -

An archaeological reconnaissance survey of the North Springfield Lake project area was completed by the Public Archaeology Laboratory in 1982. No prehistoric sites were identified as a result. A total of sixty-eight (68) historic archaeological sites were identified during the survey of which forty-four (44) are recommended for further evaluation. In addition, archaeological sensitivity maps were produced for prehistoric and historic archaeologically sensitive areas throughout North Springfield Lake. These areas exhibit variables favorable for the existence of additional archaeological sites.

The following management activities should be coordinated with an NAE archaeologist prior to implementation: new agricultural leases, new wildlife foot plots, construction of restroom facilities, picnic shelters or recreational areas, parking lot expansion, new sand or gravel mining areas, timber removal using heavy equipment, new real estate outgrants, and any other activities or special use permits that might disturb the topsoil or known cultural resources. This could result in further coordination with the Vermont State Historic Preservation Officer (VT SHPO) and further archaeological testing, if necessary. Project staff should monitor study area for possible damage to archaeological resources from erosion caused by flooding, digging or looting for objects particularly during periods of pool fluctuation, and damage to the soil from off road vehicles. Newly plowed fields and low pools may be of interest as archaeological resources can be quickly and easily collected.

Known and documented prehistoric and historic archaeological sites within the study area are to be protected and afforded the same consideration as any other project resource management (ER 1130-2-438 Historical Preservation Program). Work in archaeologically sensitive areas should be coordinated with an NAE archaeologist prior to initiation. Construction activities should be designed to avoid known sites. If this is not possible, impacts to sites should be kept to a minimum. In all cases, these actions should be coordinated with NAE. If avoidance of sites is not prudent or feasible, then further study and testing may be required in consultation with the VT SHPO prior to implementation. Known archaeological sites should also be maintained by project staff and monitored for damage. Foundations and cellar holes can be filled with clean fill and should be left intact. Industrial mill sites or remains should also be checked for damage and reported to NAE, if necessary. Section 110 of the National Historic Preservation Act of 1966, as amended, requires that Federal agencies have a program for the identification, inventory and nomination to the National Register of Historic Places for all cultural resources on lands owned or under the control of the said agency.

It is recommended that the North Springfield Lake project area be subjected to an intensive archaeological survey of all identified historic and archaeological sites as well as for all

archaeologically sensitive areas as indicated within the archaeological reconnaissance report. This survey could also include determination of the integrity and extent of identified resources and preliminary determinations for listing on the National Register of Historic Places. In the interim, a Historic Properties Management Plan (HPMP) should be prepared for North Springfield Lake. This HPMP would document all known sites and sensitive areas and create a management plan and recommendations for proper management of these resources on a continuous basis. This document would also be coordinated with the VT SHPO. Currently, NAE has just begun preparing these HPMPs for several Corps facilities. We recommend that the North Springfield Lake facility include provisions for preparation of a HPMP in the next available budget cycle. NAE staff archaeologists have further information on these plans.

#### INDIVIDUAL FINDING SHEET

12870 VT NORTH SPRINGFIELD LAKE

Type of Finding: NEGATIVE

Finding Category: MINOR

Condition (What did you find?)

North Springfield Lake lacks an intensive level archaeological survey of all identified sites and archaeologically sensitive areas.

Criteria (What is the actual requirement?)

C.5.1. All Federal agencies are required to establish a program to locate, inventory, and nominate to the SOI all properties under the agency's ownership or control that appear to qualify for inclusion on the National Register of Historic Places (36 CFR 60.9).

#### Suggested Solutions:

An intensive level archaeological survey should be completed for all sensitive areas within the project. In addition, identified sites should be further evaluated for significance and listing on the National Register of Historic Places.

#### Comments:

The survey and evaluations can be done in a phased manner, perhaps with historic sites evaluated first, then with select portions of the sensitive areas. If known development is anticipated in particular areas, then they can be intensively studied first. In the interim, a Historic Properties Management Plan may be appropriate for managing the known sites and sensitive areas. This Plan could be completed in conjunction with an EA update in FY 98.

#### INDIVIDUAL FINDING SHEET

12870 VT NORTH SPRINGFIELD LAKE

Type of Finding: NEGATIVE

Finding Category: MINOR

Condition (What did you find?)

Unauthorized construction projects undertaken without consideration of cultural resources (i.e. service road building, parking lot construction and paving, bulldozing of a building foundation, and the turning over and seeding of fields).

Criteria (What is the actual requirement?)

C.4. When a previously unrecorded historic property is discovered in the course of construction or while implementing other undertakings, including routine operations and maintenance, the work must be halted until the situation is properly evaluated (ER 1130-2-438, para 13).

#### Suggested Solutions:

All construction activities or other potentially damaging management activities as indicated in the OMP Cultural Resources checklist should be preceded by review from a NAE archaeologist.

#### Comments:

Known sites are to be protected in addition to those within sensitive areas. Any previously unrecorded or unknown resource discovered during normal operations and maintenance or during construction activities should be evaluated prior to any further proceedings with the undertaking.

## HAZARDOUS MATERIALS MANAGEMENT

## HAZARDOUS WASTE MANAGEMENT

## NATURAL RESOURCES MANAGEMENT

#### INDIVIDUAL FINDING SHEET

12870 VT NORTH SPRINGFIELD LAKE

Type of Finding: NEGATIVE

Finding Category: MAJOR

Condition (What did you find?)

Fill material was placed in wetlands during construction of a road without a permit (see Appendix C for locations).

Criteria (What is the actual requirement?)
NR.7. Floodplains and wetlands should be identified and protected.

#### Suggested Solutions:

The Project Manager should request Evaluation Branch review this activity, and any other similar activity, to determine environmental compliance requirements.

#### Comments:

Department of the Army permits are required for the discharge of fill material into waters of the United States (33 CFR 323.3 (a) and 323.3 (b)). In addition, the State of Vermont requires a predischarge certification to determine if the activity complies with a Nationwide Permit (in this case Nationwide Permit #14 - Minor Road Crossing). Vermont has denied Water Quality Certification to all Nationwide Permits. As a result, Water Quality Certification is also required for this activity.

#### INDIVIDUAL FINDING SHEET

12870	יויע	ИТЯОИ	SPRINGFIELD	LAKE

Type of Finding: NEGATIVE

Finding Category: MINOR

Condition (What did you find?)

The Environmental Assessment (EA) for project operation and maintenance does not adequately describe existing resources, activities, or impacts.

Criteria (What is the actual requirement?)

NR.20.1. Installations/CW facilities with Federally designated endangered and threatened species must carry out programs for their conservation (50 CFR 402.01 (a), 402.10, and 402.12).

Suggested Solutions: Update the project EA.

Comments:

An update of the EA has been scheduled for FY 98.

#### INDIVIDUAL FINDING SHEET

	12870 VT NORTH SPRINGFIELD LAKE	
	Type of Finding: NEGATIVE Finding Category:	MINOR
,	Condition (What did you find?)	
	The project lacks a threatened/endangered species surve	у.
	Criteria (What is the actual requirement?)	

### Suggested Solutions:

Conduct a survey of the project for rare/protected species and rare plant communities. Develop a management plan to protect rare species and communities.

NR.9. Emphasis should be placed on the maintenance and restoration of habitat favorable to the production of indigenous fish and wildlife.

#### Comments:

A threatened/endangered species survey has been scheduled for FY 98.

#### INDIVIDUAL FINDING SHEET

12870 VT NORTH SPRINGFIELD LAKE	
Type of Finding: NEGATIVE	Finding Category: MINOR
Condition (What did you find?)	
Wetlands at the project have not been	n identified and protected.
Criteria (What is the actual requirem NR.10.2. Floodplains and wetlands sh	

Suggested Solutions:

Map wetlands and wetland community types.

#### Comments:

A survey to identify and delineate wetlands has been scheduled for FY 98.

#### INDIVIDUAL FINDING SHEET

12870 VT NORTH SPRINGFIELD LAKE
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Type of Finding: NEGATIVE Finding Category: MINOR

Condition (What did you find?)

No survey of shoreline erosion or land erosion at the Project is available.

Criteria (What is the actual requirement?)

NR.5. A protective vegetative cover or other measures shall be provided to control dust and erosion damage to land (ER 1130-2-400, para 11(c) and EM 1110-1-400, para 5-4).

Suggested Solutions:

Complete an erosion survey.

#### Comments:

An erosion survey has been scheduled for FY 97.

#### INDIVIDUAL FINDING SHEET

12870 VT NORTH SPRINGFIELD LAKE

Type of Finding: NEGATIVE

Finding Category: MANAGEMENT PRACTICE

Condition (What did you find?)

There is no minimum release rate established at the project for periodic inspections and routine maintenance. Reservoir control plans do not include measures to minimize the impacts of gate closures on downstream aquatic life.

Criteria (What is the actual requirement?)

NR.9. Emphasis should be placed on the maintenance and restoration of habitat favorable to the production of indigenous fish and wildlife.

#### Suggested Solutions:

Reservoir control plans should include an SOP to assure that planned (non-emergency) closures for routine inspections and maintenance are conducted in a manner which avoids impacts to downstream aquatic life. Non-emergency inspections and maintenance of the conduit should be scheduled during low flow periods and during early morning or late afternoon to minimize stream warming. Flows should be gradually reduced to minimize stranding of downstream aquatic life.

#### Comments:

The downstream impacts on biological resources associated with non-emergency closures will be addressed in the Environmental Assessment. Coordination with state and Federal resource agencies will be included.

## OTHER ENVIRONMENTAL ISSUES

#### INDIVIDUAL FINDING SHEET

12870 VT NORTH SPRINGFIELD LAKE

Type of Finding: NEGATIVE

Finding Category: MINOR

Condition (What did you find?)

A comprehensive noise survey has not been conducted to identify potential noise hazards and to determine adequate personnel protection.

Criteria (What is the actual requirement?)

O2.2. The making or continuance of excessive noise at any time or any place, and by any means, is prohibited when it interferes with an authorized use or project purpose (ER 1130-2-400, para 17(e)).

Suggested Solutions:

Conduct a comprehensive noise survey and institute controls where needed.

#### Comments:

The Project Manager has established a noise complaint log and scheduled a noise survey with the Safety and Occupational Health Office for FY 98.

## PESTICIDE MANAGEMENT

## PETROLEUM, OIL AND LUBRICANT MANAGEMENT

## SOLID WASTE MANAGEMENT

## STORAGE TANK MANAGEMENT

## TOXIC SUBSTANCES MANAGEMENT

#### INDIVIDUAL FINDING SHEET

TZ\$/0	VT	NORTH	SPRINGFIELD	LAKE

Type of Finding: NEGATIVE

Finding Category: MINOR

Condition (What did you find?)

North Springfield Lake has not conducted an asbestos survey.

Criteria (What is the actual requirement?)

T2.2. Facility buildings with the potential to be contaminated with asbestos should be tested and surveyed for asbestos and friable material.

#### Suggested Solutions:

Once an asbestos survey has been completed, the results should be monitored and maintained.

#### Comments:

The Project Manager has scheduled an asbestos survey with the Safety and Occupational Health Office for FY 97. Any friable asbestos found on-site should be removed and access to those areas should be restricted.

## WASTEWATER MANAGEMENT

#### Wastewater Management

#### Narrative-

The external inspection of North Springfield Lake was carried out on 8 April 1997. After meeting at the project office, we drove around and looked at different areas of the project. Some areas were inaccessible due to snow cover. Information concerning compliance issues within these areas was obtained during the interview with project staff. There has been no change in wastewater disposal at the project except for the addition of a septic system for the fee collector's seasonal residence at Stoughton Pond.

## Resolution of Past Findings

<u>Minor Deficiency</u>. Unregistered floor drains were in the garages at the project office. These floor drains discharge to a holding tank and are now registered with Vermont.

#### **Findings**

No deficiencies were identified relating to wastewater disposal in this external assessment.

## WATER QUALITY MANAGEMENT

#### Water Quality Management

#### Narrative-

The external inspection of North Springfield Lake was carried out on 8 April 1997. After meeting at the project office, we drove around and looked at different areas of the project. Some areas were inaccessible due to snow cover. Information concerning compliance issues within these areas was obtained during the interview with project staff. There has been no change in water supply at the project except for the addition of a well for the fee collector's seasonal residence at Stoughton Pond. This well does not qualify as a public water supply.

#### Resolution of Past Findings

- a. <u>Minor Deficiency</u>. The public water supply well at Stoughton Pond was not being operated by a certified operator. Tom Coen is now a certified operator. Mike Curran, Phil Morrison, and Mark Rosenthal are also certified and serve as backups.
- b. <u>Minor Deficiency</u>. Results of routine monitoring of potable water sources were not reported to the State within 24 hours. The NAE Lab regularly reports testing results for public water supplies to the States within 24 hours.

#### 4. Findings.

No deficiencies were identified relating to water quality during this external assessment.

#### NEW ENGLAND DISTRICT ERGO TEAM

Bruce Williams - Program Manager Construction-Operations Division - Operations Technical Support Section

Jeff Deyette - ERGO Team Leader Construction-Operations Division - Operations Technical Support Section

Marc Paiva Engineering-Planning Division - Environmental Resources Section

Judi Johnson Engineering-Planning Division - Environmental Resources Section

Townsend Barker Engineering-Planning Division - Water Quality Management Branch Chairman, NEA's Water Quality Team

Anne Laster Real Estate Division - Conveyancing Branch The ERGO Team would like to thank the following individuals who participated in the preassessment evaluation, field inspection and/or in the research and evaluation of environmental compliance guidance:

North Springfield Lake

Mike Curran - Basin Manager Gary Pelton - Basin Ranger Thomas Coen - Project Manager Thomas Snow - Park Ranger

#### **APPENDICES**

## APPENDIX A: Previsit Questionnaires

## North Springfield Lake

#### Table 1

#### ERGO PREVISIT QUESTIONNAIRE (PVQ)

This questionnaire will provide background information necessary to plan and conduct an environmental compliance assessment. Additionally it provides insight for properly designing the composition of expertise on the assessment team.

	2010/10/10 1/4/1001		
•		RESPONSE	REFERENCE IN TEAM
Se	ection 1. Air Emissions Management		
1.	Does the facility have any air permits to maintain with state regulatory authority (i.e. boilers, pathological incinerators, operating or construction permits, paint spray booths, POL tank venus, etc.)? Inclusively list the types and numbers of each:		If YES, see checklist item A.1.3
	Type of Permit Quantity		
			•
2.	Does the facility operate a fuel burner (central steam plant or hot water steam boiler)?	16	If YES, see checklist item A.10.1 through
	If YES, how large and what fuel is used?  Size Fuel		A.10.10
		16	<i>:</i>
3.	Does the facility operate an incinerator (i.e., for classified documents, solid waste, sewage sludge, etc.)? If YES, please list type and number.	<u> </u>	If YES, see checklist item A.25.1 through
	Type Number		A.25.3 and A.41.1 through A.45.8
4,	Does the facility operate fuel dispensing facilities?	No	If YES, see
	How many?	/	checklist item A.55.1 through A.55.6
5.	Does the facility use any volatile organic compound (VOC) based solvent degreasers?	1/0	If YES, see checklist item

RESPONSE REFERENCE IN TEAM YES. 6. Does the facility operate maintenance shops? checklist item A.1.3, 1.88.A Type Quantity through A.95.2 Wheeled Tracked Aircraft Please list any additionally shop activities that generate any form of air pollution (i.e., vehicle emissions systems, ventilation systems for various operations, etc.) 7. Does the facility operate equipment or processes that could lead to fugltive YES. checklist item emissions of vinyl chlorides or benzene? A.65.1 through A.65.7 What types of equipment? 8. Does the facility procure/use chlorofluorocarbons (CFC) or halon sub-YES. see checklist item stances? A.85.1 through A.85.4 YES. 9. Does the facility repair any units containing refrigurant? checklist item A.90.1 through A.95.2

YES.

A.90.1 through

YES.

checklist

A.95.2

checklist

A.1.3

Sec

item

see

item

10. Does the facility recycle/reclaim CFCs or halon?

rators that have been imposed upon them.

11. Does the facility have any vapor emissions requirements for oil/water sepa-

#### Section 2. Cultural Resources Management

1.	Does the facility have any cultural resources eligible for or that are currently listed in the National Register of Historic Places?	If YES, see checklist item C.5.1 through C.5.3
2.	Are their any cultural resources (archeological sites, buildings over 50 yr - old) that have not been evaluated for the National Register?	If YES, see checklist item C.5.1 through C.5.3
3.	Does the facility Master Plan contain a cultural resources overlay that is utilized for planning purposes?	If YES, see checklist item C.5.1.1
4,	Is there an on-staff Cultural Resources Coordinator?	See Supplement
5.	If not, does a staff person have cultural resources as "other duties as assigned"?	See Supplement
6.	Does the facility have any archeological artifacts in storage?	If YES, see checklist item C.20.1 through C.20.9
7,	Does the facility have in storage, or know of, any locations of Native - American burials, cemeteries, or human remains?	If YES, see checklist item C.15.1 through C.15.2
8.	Are there any areas on the facility considered to have religious importance to any Native American Tribe?	If YES, see checklist item C.10.1

### Section 3. Hazardous Materials Management

1.	Has the facility conducted training for individuals working with hazardous materials?	<u>425</u>	If YES, see checklist item HM.10.1 through HM.10.2
2.	Does the facility have an Oil and Hazardous Substances Contingency Plan (OHSCP)?	· YES	If YES, see checklist item HM.1.3
3.	Does the facility store any extremely hazardous substances?	1/0	If YES, see checklist item HM.25.1
4.	Does the facility store at one time 10,000 lb or more of any hazardous substances that requires a Material Safety Data Sheet (MSDS) (fuel is a hazardous substance which requires an MSDS)?  (NOTE: Using water as a basis of measurement, 10,000 lb is approx. 1,250 gal.)		If YES, see checklist item HM.30.1 through HM.30.3
	Please list substances	,	•
5.	Does the facility store any flammable/combustible liquids?	<u>421</u>	If YES, see checklist item HM.35.1 through
6.	Does the facility store any compressed gases?	421	HM.40.3  If YES, see checklist item HM.45.1

#### Section 4. Hazardous Waste Management

1. Is the facility a generator of hazardous waste?

If YES, see checklist item HW.10.1 through

HW.10.2

HW.15.6

- 2. Does the facility generate less than 100 kg [220.46 lb, approx. 28 gal] of hazardous waste in 1 mo?
- If YES, see checklist item HW.15.1 through

- 3. Does the facility generate more than 100 kg (220.46 lb, approx. 28 gal) but less than 1000 kg (2204.62 lb, approx. 273 gal) of hazardous waste in 1 mo?
- If YES, see checklist item HW.20.1 through HW.45.5
- 4. Does the facility generate more than 1000 kg [2204.62 lb, approx 273 gal] of hazardous waste in 1 mo?
- If YES, see checklist item HW.55.1 through HW.90.6

## RESPONSE REFERENCE

(NOTE: Any waste which is not excepted, which is listed in 40 CFR 261, or which exhibits the following characteristics is a hazardous waste:

- Ignitability (flash point <140 F) or
- Corrosivity (pH < 2 or > 12.5) or
- TCLP Toxicity (for As, Ba, Cd, Cr, Pb, Hg, Se, Ag. and selected pesticides or
- Reactive. (or CN).)

	ce following are hazardous wastes that may typically be found at a facility (check if used at this count used):	facility and indicate
	- Solvents	•
Œ	his includes trichloroethane, Methylene, Chloride, Tetrachloroethylene, 1,1,1 Trichloroethane,	
Ca	rbon tetrachloride, Chlorinated Fluorocarbons, Toluene, MEK, Mineral spirits, and Xylene.)	
	- Liquid paint	•
	- Paint stripper, remover or thinner	•
	- Spray paint booth air filters	-
	Pesticides, insecticides, herbicides	<b>-</b>
	- NRC filters and test kits	
	- Super tropical bleach	
	- Ordnance, ammunition, explosives and residues	
	- Battery acid and caustics in unserviceable batteries	
	- Pharmaceuticals	•
	- POL tank farm fuel system filters	
	- De-icing solution	_
	-, Printing ink, ink solvents, and cleaners	
	- Absorbent material and soil contaminated with hazardous waste	
	- Other	_
	- Other	_
	- Other	_
<b>S</b> .	What Hazardous Waste permits have been applied for?	If any, see checklist item
	Part A Part B	HW.1.3
	Interim Status	
	· · · · · · · · · · · · · · · · · · ·	
	None needed	
6.	Does the facility accept wastes from other facilities for treatment, storage, or disposal?	If YES, see checklist item
		HW.105.1
		through HW.170.5
-	Development of the second of t	See checklist
1.	Does the facility operate accumulation points?	
	How many?	icems based on
	Where?	how much is generated

			in team	1
8.	Does the facility operate satellite accumulation points?  How many?	<u> </u>	See checitems based how much generated	On
9.	Does the facility treat hazardous waste onsite?  How and where?		HW.105.1 through	sce item
10	Does the facility store (temporary or long term) hazardous waste onsite at	1/0	HW.255.3 If YES,	sec
10.	other than an accumulation point?		checklist HW.105.1 through	item
	Where?	16	HW.255.3 If YES.	sec
11.	Does the facility dispose of hazardous waste onsite?			item
	How and where?		through * HW.255.3	

REFERENCE

RESPONSE

٠,

through NR.20.3

through NR.20.3

see

item

If YES,

checklist

NR.20.1

#### Section 5. Natural Resources Management

5. Does the facility have any endangered species on its property?

1.	Does the facility have any outdoor recreation areas? (i.o., athletic fields, walking/hiking tracks, off-road vehicles tracks, etc.)	If YES, see checklist item NR.1.3
2.	Does the facility have a plan for managing its natural resources?	See Supplement
	Are there any areas on the facility that have:	If YES, see checklist Item
•	A. Wedands? If so, are they permitted/regulated by definition?	NR.10.1 through NR.10.3
	B. Flood Plains?  25-yr  50-yr  100-yr	
	Shoreline?	•
	Forests?	** \$M7A
4.	Has a survey to locate and identify threatened and endangered species and critical habitats been initiated?	If YES, see checklist item

#### Section 6. Other Environmental Issues

1. Has the facility recently (within the past 5 yr) prepared, or is it in the process of preparing, and environmental assessment (EA) or environmental impact statement (EIS)?

1/6

If YES, see checklist item O1.1.1 through O1.5.14

For current mission?

For future Master Plan?

Any construction projects, timber sales, etc.?

2. Does the facility have any operations that produce environmental noise or noise that goes outside the facility (i.e. ranges, skeet ranges, helicopter pad, generators, highway transportation)?

1/0

3. Is the facility engaged in any real property transaction?

If YES, see checklist item O2.1.1 through O2.1.3

If YES, see checklist item OS.1.1 through OS.1.3 and see Supplement

#### Section 7. Pesticide Management

1.	Does the facility use pesticides?	•	425	If YES, see checklist Item PM.S.1 through
	Contractor application? In-house application?			PM.20.2
	Both contractor and in-house application?		· No	
2.	Are any posticide wastes disposed of at the facility?	•	1/0	If YES, see checklist Item PM_55.1
3.	Are pesticides stored on the facility?		100	If YES, sec checklist item
	Please list locations.			PM.45.1 through PM.45.2
4,	What are the pesticides used at the facility? (Attach a separate list if necessary)	· •		NA
	Rodeo	·		
	Roundab			,
			1/0	
5.	Are pesticides used at offsite satellite facilities?		700	If YES, see checklist item
		•	1/0	PM.5.1 through PM.45.2
6.	Does the facility maintain a pesticide/entomology sho	p?	<u> </u>	If YES, see checklist item
	If YES, is it permitted by the state?		. 1.	PM.45.1 through PM.45.2
7.	Is there an annual inventory available for review?		<u>485</u>	See Supplement

#### Section 8. Petroleum, Oll, and Lubricant (POL) Management

1.	Does the facility have a current (3 yr old or less and Countermeasure (SPCC) plans?	VE 5	If YES, see checklist item PO.5.1 through PO.5.7	
2.	Is the SPCC/ISC exercised annually (mock spill	events conducted)?	. Y & S	If YES, see checklist item PO.5.1 through PO.5.7
3.	Does the facility store used oll?			If YES, see
	Where?			PO.60.1 through
		<u> </u>		• • • • •
4.	Does the facility have any pipelines?		<u>Ne</u>	If YES, see checklist item PO.40.1 through PO.40.10
5.	Does the facility operate any service stations?		<u> 1700                                  </u>	If YES, see checklist item PO.45.1 through

## RESPONSE REFERENCE IN TEAM

Sec	ction 9. Solid Waste Management	/	
ı.	Does the facility have a solid waste management facility onsite?  TYPE NUMBER  Landfill Incinerator	NO	If YES, see checklist item SO.30.1 through SO.95.2
_	Transfer Point	425	If YES, see
2.	Does the facility contract out the collection of its solid waste?		checklist Item SO.10.1 through
3.	Does the facility have a:	485	SO.10.6  If YES, see
	solid waste recycling program? List commodities recycled:		so.25.4 through
	Construction debris landfill:  Is it permitted?  Operated by:	Ur s	, •
4.	Is waste transported offsite for disposal?  In landfills?	<u>YES</u>	If YES, see checklist item SO.1.3
	In incincrators?		00
	Transfer Stations?		
	Recycling plant?	1/0-	
\$.	Does the facility dispose of ash residue or sludge:  Offsite?  Onsite?		If YES, see checklist item SO.1.3
6.	Does the facility receive refuse from outside the United States?	No	If YES, see checklist item
	If YES, is laboratory testing performed?	1/0	SO.100.1
7.	Does the facility operate battery shops, including charging areas within vehicle maintenance facilities?		If YES, see checklist item SO.1.3
	If YES how many?		•

#### Section 10. Storage Tank Management

1.	Does the facility have aboveground storage tanks (ASTs) used for the storage of petroleum products or hazardous waste?  (Attach additional page if necessary)			If YES, see checklist item ST.5.1 through			
	Location	Substance		Capacity		•	ST.20.3 and ST.100.1
<	SATEHOUS	TUE L	014	1000	<u>a-/</u>	·	through ST.150.2
2.	Does the facili	ty have any U	STs?			YES	If YES, see
	Location	Quantity	Size	Material Stored	Permitted		checklist item ST.25.1 through
	OFFICE QUALTERS		5500 3500	FL TOEL O	<u>"L_No</u> "		ST.95.7
			<u> </u>				. •
						•	
	•						
	(Attach a separ	ate inventory	sheet if nec	cssary)		1/2	
3.	Does the facilit	y have any U	STs out-of-	service or abando	ned?		If YES, see checklist item ST.95.1 through ST.95.7
4.	Is there a progr	am in place to	manage u	nserviceable/aban	doned tanks?	185	If YES, see checklist item ST.95.1 through ST.95.7

#### Section 11. Toxic Substances Management I. Has the facility conducted a survey for PCBs? checklist ìtem Ti.10.1 through T1.10.3 YES. 2. Are PCBs or PCB-contaminated oils in use or stored at the facility in: checklist item T1.20.1 through Transformera T1.20.9 and Capacitors\_ TI.30.1 through Electromagnets\_ T1.35.1 Heat Transfer or Hydraulic Systems\_ Circuit Breaker\_ Fluorescent Light Ballasts\_ Other\_ YES. If 3. Does the facility dispose of PCBs or PCB items at the facility checklist item T1.50.1 through T1.50.11 YES. Τf scc 4. Does the facility transport PCBs checklist T1.45.1 through T1.45.2 See Supplement 5. Has the facility conducted a complete facility-wide asbestos survey? See Supplement 6. Does an Asbestos Management Plan exist? YES. 7. Is maintenance done on items insulated with asbestos? checklist item T2.5.1 through T2.10.1 YES. 8. Has the facility undergone any asbestos removal projects in the past? checklist item T2.5.1 through How long ago? T2.10.1 By contract or in-house? YES. 9. Is there any asbestos on the facility that has been removed and is awaiting checklist item disposal? T2.15.1 through T2.15.4 YES. 10. Will the facility have any demolition, remodeling, or renovation projects checklist item underway at the time of the assessment? T2.5.1 through T2.10.1 Please identify those projects and buildings.

	RESPONSE	REFERENCE IN TEAM
11. Is asbestos material removed by contract or in-house personnel?	CONTRACT	'If YES, see checklist item T2,10.1
12. Does the facility monitor for radon gas?	<u> </u>	If YES, see checklist item T3.1.1 through T3.1.3
13. Is there a program to reduce radon threat?	· \£5	See Supplement
14. Has the facility populace been informed of the final status?	1/85	See Supplement
15. Is the facility performing any lead based paint removal?	No	If YES, see checklist item T4.1.1 through

#### Section 12. Wastewater Management

l.	Opes the facility have a National Pollutant Discharge Elimination System (NPDES) and/or State Pollutant Discharge Elimination System (SPDES) permit? Identify the types of discharges:		checklist item WA.10.1 through WA.10.6
	Stormwater runoff permits?		
	Drainage water from dredge and fill materials?	•	
•	Wastewater treatment plant?		
	How many and what size?		
	Process wastewater?		
	Heat/Power production cooling blowdown water?	Ÿ	•
	Stormwater runoff from fuel dispensing areas, airfields, and parking lots/aprons and maintenance facilities?		·
	Vehicle wash facilities? How many?		
	Plating shops?		•
	Does the facility maintain sedimentation holding pends or scepage pits from vehicle/aircraft washing, maintenance shop drainage (shop operations and motor parks), and other activities?		
	Operate cooling towers and pass through water?	·	
	Fresh water wetlands?	•	
	Industrial waste system/discharge?		
	Lines which bypass treatment structures?		
	Other?	1/0	
2.	Does the facility discharges into a publicly owned treatment works (POTW) any of the following?	70 9	If YES, see checklist item WA.10.1 through
	Process wastewater?		WA.25.9
	Process wastewater? Domestic (sanitary) wastewater?		
	Industrial wastewater treatment plant effluent?	1	
	Other?	$\Lambda/\rho$	
<b>3.</b>	Are there any discharge bypass lines in the system?		If YES, see checklist item
		1/0	WA.25.1 through WA.25.9
4.	Does the facility have any sludge disposal areas from vehicles/equipment washing operations?	700	If YES, see checklist item WA.1.3
	Is the sludge analyzed or characterized on a scheduled frequency prior to disposal?	96	
5.	What percent of vehicle maintenance is performed by contract?	12	If YES, see checklist item
	Is it performed onsite or offsite? PRINTE		WA.1.3

REFERENCE

RESPONSE

Signature of individual completing this form:

Date completed: 13/19/90

## Ascutney Mountain Audubon Society Spring Weather Nature Area

#### Table 1

#### ERGO PREVISIT QUESTIONNAIRE (PVQ)

This questionnaire will provide background information necessary to plan and conduct an environmental compliance assessment. Additionally it provides insight for properly designing the composition of expertise on the assessment team.

4	Name of Facility: NORTH Springfield LAKE Environmental POC: AS CUTNEY MT. AUDUS C Telephone Number: 802-263-5488 (ELEA	PROJ NOR ELL
	+ for SPRING WEATHER NATURE	AREA RESPONSE
Se	ction 1. Air Emissions Management	
1.	Does the facility have any air permits to maintain with state regulatory authority (i.e. boilers, pathological incinerators, operating or construction permits, paint spray booths, POL tank vents, etc.)? Inclusively list the types and numbers of each:	<u> </u>
	Type of Permit Quantity	
		NO
2.	Does the facility operate a fuel burner (central steam plant or hot water steam boiler)?	
	If YES, how large and what fuel is used? Size Fuel	
3.	Does the facility operate an incinerator (i.e., for classified documents, solid waste, sewage sludge, etc.)? If YES, please list type and number.	NO
	Type Number	
		•
4.	Does the facility operate fuel dispensing facilities?	ho
	How many?	
5.	Does the facility use any volatile organic compound (VOC) based solvent	NO
	degrassers?	

RESPONS
---------

6.	Does the facility	operate maintenance shops?	NO
	Туре	Quantity	
	Wheeled		
	Tracked		
	Aircraft		•
	Please list any a lution (i.e., veh operations, etc.)	dditionally shop activities that generate any form of air policle emissions systems, ventilation systems for various	
			NO
7.		y operate equipment or processes that could lead to fugitive nyl chlorides or benzene?	
	What types of e	quipment?	NO
8.	Does the facili stances?	ty procure/use chlorofluorocarbons (CFC) or halon sub-	
9.	Does the facility	y repair any units containing refrigurant?	<u> </u>
10	. Does the facilit	y recycle/reclaim CFCs or halon?	NO
11		y have any vapor emissions requirements for oil/water sepa-	NU

#### Section 2. Cultural Resources Management

- 1. Does the facility have any cultural resources eligible for or that are currently listed in the National Register of Historic Places?
- 2. Are their any cultural resources (archeological sites, buildings over 50 yr old) that have not been evaluated for the National Register?

  OLD MILL SITE
- 3. Does the facility Master Plan contain a cultural resources overlay that is utilized for planning purposes?
- 4. Is there an on-staff Cultural Resources Coordinator?
  5. If not, does a staff person have cultural resources as "other duties as assigned"?
- 6. Does the facility have any archeological artifacts in storage?
- 7. Does the facility have in storage, or know of, any locations of Native
  American burials, cemeteries, or human remains?
- 8. Are there any areas on the facility considered to have religious importance to any Native American Tribe?

C 43 4	TT	3.4		* /
Section 3	. Hazar	uous w	lateriais	Management

	<u> </u>
materials:	
Does the facility have an Oil and Hazardous Substances Contingency Plan	ΝO
(OHSCP)?	
Does the facility store any extremely hazardous substances?	NO
Does the facility store at one time 10,000 lb or more of any hazardous substances that requires a Material Safety Data Sheet (MSDS) (fuel is a haz-	NO
ardous substance which requires an MSDS)?	
(NOTE: Using water as a basis of measurement, 10,000 lb is approx. 1.250 gal.)	
Please list substances	
•	NO
Does the facility store any compressed gases?	NV
	Does the facility store at one time 10,000 lb or more of any hazardous substances that requires a Material Safety Data Sheet (MSDS) (fuel is a hazardous substance which requires an MSDS)?  (NOTE: Using water as a basis of measurement, 10,000 lb is approx. 1,250 gal.)  Please list substances  Does the facility store any flammable/combustible liquids?

#### Section 4. Hazardous Waste Management

- 1. Is the facility a generator of hazardous waste?
- 2. Does the facility generate less than 100 kg [220.46 lb, approx. 28 gal] of hazardous waste in 1 mo?
- 3. Does the facility generate more than 100 kg {220.46 lb, approx. 28 gal} but less than 1000 kg [2204.62 lb, approx. 273 gal] of hazardous waste in 1 mo?
- 4. Does the facility generate more than 1000 kg [2204.62 lb, approx 273 gal] of hazardous waste in 1 mo?

#### RESPONSE

(NOTE:	Any waste	which is	not	excepted,	which	is	listed	in	40	CFR	261,	or	which	exhibits	the	following
characteri	stics is a haz	ardous wa	iste:													

- Ignitability (flash point <140 F) or</li>
  Corrosivity (pH < 2 or > 12.5) or
  TCLP Toxicity (for As, Ba, Cd, Cr, Pb, Hg, Se, Ag, and selected pesticides or
  Reactive. (or CN).)

The following are hazardous wastes that may typically be found at a facility (check if used at this facility and indicate amount used):

- Solvents	
(This includes trichloroethane, Methylene, Chloride, Tetrachloroethylene, 1,1,1	Trichloroethane,
Carbon tetrachloride, Chlorinated Fluorocarbons, Toluene, MEK, Mineral spirits	
- Liquid paint	
- Paint stripper, remover or thinner	
- Spray paint booth air filters	
- Pesticides, insecticides, herbicides	
- NRC filters and test kits	
- Super tropical bleach	·
- Ordnance, ammunition, explosives and residues	
- Battery acid and caustics in unserviceable batteries	
- Pharmaceuticals	
- POL tank farm fuel system filters	<del></del>
- De-icing solution	
- Printing ink, ink solvents, and cleaners	·
- Absorbent material and soil contaminated with hazardous waste	<del></del>
- Other	
- Other	
- Other	
5. What Hazardous Waste permits have been applied for?	
Part A	
Part B	
Interim Status	
None needed	-
	K) O
6. Does the facility accept wastes from other facilities for treatment, storage, or disposal?	
•	
	NU
7. Does the facility operate accumulation points?	
How many?	
Where?	

		RESPONSE
8.	Does the facility operate satellite accumulation points?  How many?	<u> </u>
9.	Does the facility treat hazardous waste onsite?  How and where?	<u> </u>
10.	Does the facility store (temporary or long term) hazardous waste onsite at other than an accumulation point?	
11.	Where?  Does the facility dispose of hazardous waste onsite?  How and where?	Nd

Sec	tion 5. Natural Resources Management	
	man of the control of	YES
ι.	Does the facility have any outdoor recreation areas? (i.e., athletic fields, walking/hiking tracks, off-road vehicles tracks, etc.)	
2.	Does the facility have a plan for managing its natural resources?	YES
3.	Are there any areas on the facility that have:	
	A. Wetlands? If so, are they permitted/regulated by definition?	YIES
	B. Flood Plains? - 7 E.S - 25-yr 50-yr 100-yr	
C. D.	Shoreline? Yhs Forests? Mes	
4.	Has a survey to locate and identify threatened and endangered species and critical habitats been initiated? - VOLUNTIEER AND	YRS
	UNOFFICIAL	
5.	Does the facility have any endangered species on its property?	YRS

BALD EAGLE > SEASONAL

#### Section 6. Other Environmental Issues

1	Has the facility recently (within the past 5 yr) prepared, or is it in the pro-	<u></u>
••	cess of preparing, and environmental assessment (EA) or environmental impact statement (EIS)?	
	For current mission?	
	For future Master Plan?	
	Any construction projects, timber sales, etc.?	Ma
2.	Does the facility have any operations that produce environmental noise or noise that goes outside the facility (i.e., ranges, skeet ranges, helicopter pad, generators, highway transportation)?	NO
3.	Is the facility engaged in any real property transaction?	NO
	me included in any ton property authorities.	

#### Section 7. Pesticide Management

١.	Does the facility use pesticides?	
	Contractor application? In-house application? Both contractor and in-house application?	. NO
2.	Are any pesticide wastes disposed of at the facility?	
3.	Are pesticides stored on the facility?	<u>N0</u>
	Please list locations.	
4.	What are the pesticides used at the facility? (Attach a separate list if necessary)	Νο
5.	Are pesticides used at offsite satellite facilities?	
6.	Does the facility maintain a pesticide/entomology sh	νυ mop?
	If YES, is it permitted by the state?	
7	Is there an annual inventory available for review?	No
	an event and minemax services.	•

#### Section 8. Petroleum, Oil, and Lubricant (POL) Management

1.	Does the facility have a current (3 yr old or less) Spill Prevention Control and Countermeasure (SPCC) plans?	<u>N0</u>
2.	Is the SPCC/ISC exercised annually (mock spill events conducted)?	. <u>NO</u>
3.	Does the facility store used oil? Where?	NO
4.	Does the facility have any pipelines?	NO
5.	Does the facility operate any service stations?	NO

# Section 9. Solid Waste Management 1. Does the facility have a solid waste management facility

If YES, how many?\_

NO

. ]	Does the facility have a solid waste management facility onsite?	
	TYPE NUMBER	
	r	
	Landfill	
	Transfer Point	NO
	Does the facility contract out the collection of its solid waste?	
۷.	Does the facility contract out the conection of its solid waste.	
		NO
3.	Does the facility have a:	
	solid waste recycling program? List commodities recycled:	
		•
	Construction debris landfill:	
	Is it permitted?	
	Operated by:	NO
4.	Is waste transported offsite for disposal?	
	In landfills?	
	In incinerators?	
	Transfer Section 2	
	Transfer Stations?	
	Recycling plant?	Na
5	Does the facility dispose of ash residue or sludge:	
	Offsite?	
	Onsite?	NO
6.	Does the facility receive refuse from outside the United States?	
	If YES, is laboratory testing performed?	NO
7.	Does the facility operate battery shops, including charging areas within	· · · · · · · · · · · · · · · · · · ·
	vehicle maintenance facilities?	•

#### Section 10. Storage Tank Management

		Does the facility have aboveground storage tanks (ASTs) used for the storage of petroleum products or hazardous waste? (Attach additional page if necessary)				
Location	Substance		Capacity			
	<u> </u>			<del></del>		
					NO	
Does the facil	ity have any US	Ts?				
Location	Quantity	Size	Material Stored	Permitted		
		<del></del> .				
	<del></del>			<del></del>		
				<del></del>		
	arate inventory s	sheet if n	ecessary)		1.1	
Does the facil	ity have any US	STs out-o	f-service or abandor	ned?	$-\nu^{o}$	

# Section 11. Toxic Substances Management

l. 1	Has the facility conducted a survey for PCBs?	<b>V</b> O
		NO .
2	Are PCBs or PCB-contaminated oils in use or stored at the facility in:	<u> </u>
	Transformers Capacitors Electromagnets Heat Transfer or Hydraulic Systems Circuit Breaker Fluorescent Light Ballasts Other	W0
3.	Does the facility dispose of PCBs or PCB items at the facility	<i>W</i> •
4.	Does the facility transport PCBs	NO
6.	Has the facility conducted a complete facility-wide asbestos survey?  Does an Asbestos Management Plan exist?  Is maintenance done on items insulated with asbestos?	NO NO
8.	Has the facility undergone any asbestos removal projects in the past?  How long ago?	NO
9.	By contract or in-house?  Is there any asbestos on the facility that has been removed and is awaiting disposal?	NO
10.	Will the facility have any demolition, remodeling, or renovation projects underway at the time of the assessment?	· NO
	Please identify those projects and buildings.	

# 11. Is asbestos material removed by contract or in-house personnel? 12. Does the facility monitor for radon gas? 13. Is there a program to reduce radon threat? 14. Has the facility populace been informed of the final status? 15. Is the facility performing any lead based paint removal?

# Section 12. Wastewater Management

			NO
1.	Does the facility have a National Pollutant Discharge Elimination Systematics and Company of the	em —	<del></del>
	(NPDES) and/or State Pollutant Discharge Elimination System (SPDE	మ)	
	permit? Identify the types of discharges:		
	Stormwater runoff permits?		
	Drainage water from dredge and fill materials?	•	
	Wastewater treatment plant?		
	How many and what size?		
	Process wastewater?		
	Heat/Power production cooling blowdown water?		
	Stormwater runoff from fuel dispensing areas, airfields, and parking		
	lots/aprons and maintenance facilities?		
	Vehicle wash facilities? How many?		
	Plating shops?		
	Does the facility maintain sedimentation holding ponds or		
	seepage pits from vehicle/aircraft washing, maintenance shop		
	drainage (shop operations and motor parks), and other activities?		
	Operate cooling towers and pass through water?		
	Septic Systems?		
	Fresh water wetlands?		•
	Industrial waste system/discharge?		
	Lines which bypass treatment structures?		
	Other?		NU
2.	Does the facility discharges into a publicly owned treatment we (POTW) any of the following?	orks -	<u> </u>
	Process wastewater?		
	Domestic (sanitary) wastewater?		
	Industrial wastewater treatment plant effluent?		
	Other?		NO
3.	Are there any discharge bypass lines in the system?		
			<i>t</i> 1
4.	Does the facility have any sludge disposal areas from vehicles/equipa	ment	wu
	washing operations?		
	Is the sludge analyzed or characterized on a scheduled frequency pri	or to	
	disposal?		NOWR
5	What percent of vehicle maintenance is performed by contract?		
	Is it performed onsite or offsite?		

#### Section 13. Water Quality Management

	Desired to the second and the development of the second se	NO
1.	Does the facility operate a public drinking water system?	
2.	Does the facility maintain wellheads?	NO
3.	Does the facility operate an underground injection well?	No
4.	Are there groundwater aquifers on the facility?	No
	Are they in use?	NO
5.	Is the facility located on a sole source aquifer?	70 -
6.	Are protective or preventative measures in place to prevent contamination of these aquifers?	NO.
		NO
7.	Are field water purification units used?	•
	How is the backwash managed from these mobile units?	
Sig	nature of individual completing this form: Eleann 1. El	le.
	Date completed:	

# State of Vermont Department of Forests, Parks and Recreation

#### Table 1

DACW33-1-86-9

# ERGO PREVISIT QUESTIONNAIRE (PVQ)

This questionnaire will provide background information necessary to plan and conduct an environmental compliance assessment. Additionally it provides insight for properly designing the composition of expertise on the assessment team.

	Name of Facili	y: North Sprin	infield Tele Project		
	Environmental	POC:		,	
	lelephone Nur	iber:			
		·		RESPONSE	
Se	ction 1. Air Emiss	ions Management			
				XI =	
1.	authority (i.e. boi	ers, pathological incine ay booths, POL tank v	maintain with state regulator rators, operating or constructio ents, etc.)? Inclusively list th	y /10 n e / +	on this
	Type of Permit	Quantity	Noxa	Cilipro	
			0,00	Derty .	
			10,00	P (	
	•		•	No	
2.	Does the facility steam boiler)?	operate a fuel burner (o	central steam plant or hot water	er — —	
	If YES, how large Size	and what fuel is used? Fuel			
				1	-
3.		operate an incinerator (i. dge, etc.)? If YES, plea	e., for classified documents, sol se list type and number.	id <u>No</u>	
	Туре	Number			
				11	•
4.	Does the facility	operate fuel dispensing f	facilities?	140	
	How many?		· · · · · · · · · · · · · · · · · · ·	ī	
5.	Does the facility degreasers?	use any volatile organic	compound (VOC) based solve	ent No	•

# RESPONSE

No

).	Does the facility	operate maintenance shops?	
	Туре	Quantity	
	Wheeled Tracked Aircraft		N
	Please list any a lution (i.e., ve operations, etc.	additionally shop activities that generate any form of air pol- hicle emissions systems, ventilation systems for various )	•
7.		y operate equipment or processes that could lead to fugitive nyl chlorides or benzene?	No
	What types of	equipment?	N
8.	Does the facil stances?	ity procure/use chlorofluorocarbons (CFC) or halon sub-	170
9.	Does the facilit	ty repair any units containing refrigerant?	No
	*		1.1
10.	Does the facili	ty recycle/reclaim CFCs or halon?	Mo
11.		ty have any vapor emissions requirements for oil/water sepa- e been imposed upon them.	Mo

# Section 2. Cultural Resources Management

1.	Does the facility have any cultural resources eligible for or that are currently listed in the National Register of Historic Places?
2.	Are their any cultural resources (archeological sites, buildings over 50 yr . No known 5.76
3.	Does the facility Master Plan contain a cultural resources overlay that is utilized for planning purposes?
	Is there an on-staff Cultural Resources Coordinator?
5.	If not, does a staff person have cultural resources as "other duties as assigned"?
6.	Does the facility have any archeological artifacts in storage?
7.	Does the facility have in storage, or know of, any locations of Native American burials, cemeteries, or human remains?
8.	Are there any areas on the facility considered to have religious importance to any Native American Tribe?

Sec	tion 3. Hazardous Materials Management	j
1.	Has the facility conducted training for individuals working with hazardous materials?	No
2.	Does the facility have an Oil and Hazardous Substances Contingency Plan (OHSCP)?	· Ho
3.	Does the facility store any extremely hazardous substances?	No
4.	Does the facility store at one time 10,000 lb or more of any hazardous substances that requires a Material Safety Data Sheet (MSDS) (fuel is a hazardous substance which requires an MSDS)?	No
	(NOTE: Using water as a basis of measurement, 10,000 lb is approx. 1,250 gal.)	
	Please list substances	
5.	Does the facility store any flammable/combustible liquids?	Mo
٠,٠	Does dividently store any manimizer controlled and address.	

6. Does the facility store any compressed gases?

#### Section 4. Hazardous Waste Management

1.	Is the facility a generator of hazardous waste?	No
2.	Does the facility generate less than 100 kg [220.46 lb, approx. 28 gal] of hazardous waste in 1 mo?	
3.	Does the facility generate more than 100 kg [220.46 lb, approx. 28 gal] but less than 1000 kg [2204.62 lb, approx. 273 gal] of hazardous waste in 1 mo?	
4.	Does the facility generate more than 1000 kg [2204.62 lb, approx 273 gal] of hazardous waste in 1 mo?	

#### RESPONSE

(NOTE:	Any waste	which	is not	excepted,	which	is	listed	in	40	CFR	261,	or	which	<b>c</b> xhibits	the	following
characteri	stics is a haz	ardous v	waste:													

- Ignitability (flash point <140 F) or
- Corrosivity (pH < 2 or > 12.5) or
- TCLP Toxicity (for As, Ba, Cd, Cr, Pb, Hg, Se, Ag, and selected pesticides or
- Reactive. (or CN).)

The following are hazardous wastes amount used):	that may typically be found at a facility (che	eck if used at this fac	ility and indicate
- Solvents		·	
(This includes trichloroethane, Met	hylene, Chloride, Tetrachloroethylene, 1,1,1	Trichloroethane,	
Carbon tetrachloride, Chlorinated F	luorocarbons, Toluene, MEK, Mineral spirit	s, and Xylene.)	
- Liquid paint			• •
	ner		
- Spray paint booth air filters	•••		
- Pesticides, insecticides, herbic	cides		
- NRC filters and test kits			
- Super tropical bleach		<del></del>	
	sives and residues		
	nserviceable batteries		
- Pharmaceuticals			
- POL tank farm fuel system hi	ters	<del></del>	
- De-icing solution	1 -1		
	l cleanersontaminated with hazardous waste		
Other		<del></del>	
		NI	
5. What Hazardous Waste permit	s have been applied for?	TAME	•
Part A			
Part B			
Interim Status		*	
None needed		• /	-
6. Does the facility accept waster or disposal?	s from other facilities for treatment, storage,	, <u>Na</u>	
•			
			•
		<b>x</b> /	
7. Does the facility operate accur	mulation points?	_ <del>\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\</del>	
How many?		•	
Where?			
	<del></del>		

8.	Does the facility operate satellite accumulation points?  How many?	
9.	Does the facility treat hazardous waste onsite?	No.
10.	Does the facility store (temporary or long term) hazardous waste onsite at other than an accumulation point?	_No_
11.	Where?  Does the facility dispose of hazardous waste onsite?	No
-	How and where?	

RESPONSE

# Section 5. Natural Resources Management

1.	Does the facility have any outdoor recreation areas? (i.e., athletic fields, walking/hiking tracks, off-road vehicles tracks, etc.)	415
	Does the facility have a plan for managing its natural resources?  Are there any areas on the facility that have:	No
	A. Wetlands? If so, are they permitted/regulated by definition?	
	B. Flood Plains?  25-yr  50-yr  100-yr	
	Shoreline? Forests?	V.
4.	Has a survey to locate and identify threatened and endangered species and critical habitats been initiated?	119
5.	Does the facility have any endangered species on its property?	2

#### Section 6. Other Environmental Issues

l.	Has the facility recently (within the past 5 yr) prepared, or is it in the process of preparing, and environmental assessment (EA) or environmental impact statement (EIS)?
	For current mission?
	For current mission?  For future Master Plan?  Any construction projects, timber sales, etc.? / start less than 3 horrs,
	Any construction projects, timber sales, etc.? /in Tec 1855 than 3 hard
2.	Does the facility have any operations that produce environmental noise or noise that goes outside the facility (i.e., ranges, skeet ranges, helicopter pad, generators, highway transportation)?  500000516
3.	Is the facility engaged in any real property transaction?

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Limited thinning in white pine stand, less than 3 acres

Sec	tion 7. Pesticide Management	$\times$
ı.	Does the facility use pesticides?	<u> 147</u>
	Contractor application? In-house application? Both contractor and in-house application?	m j
2.	Are any pesticide wastes disposed of at the facility?	· Ho
3.	Are pesticides stored on the facility?	Ho
	Please list locations.	
4.	What are the pesticides used at the facility? (Attach a separate list if necessary)	
5.	Are pesticides used at offsite satellite facilities?	
6.	Does the facility maintain a pesticide/entomology sh	op?
	If YES, is it permitted by the state?	No
7	. Is there an annual inventory available for review?	110

Sec	tion 8. Petroleum, Oil, and Lubricant (POL) Management	1	
1.	Does the facility have a current (3 yr old or less) Spill Prevention Control and Countermeasure (SPCC) plans?	No.	
2.	Is the SPCC/ISC exercised annually (mock spill events conducted)?	No	
3.	Does the facility store used oil?	No	
	Where?		
		Vas	
4.	Does the facility have any pipelines? water line burye was for potable Water, not used but charged.  Does the facility operate any service stations?	carently	#2
5.	Does the facility operate any service stations?		

public drinking water line from surface reservoir. Waterline is currently charged but not

# Section 9. Solid Waste Management

1.	Does the facility have a solid waste management facility onsite?  TYPE  NUMBER	NO
	Landfill Incinerator, Transfer Point	
2.	Does the facility contract out the collection of its solid waste?	
3.	Does the facility have a:	No
	solid waste recycling program? List commodities recycled:	. •
	Construction debris landfill:  Is it permitted?  Operated by:	·
4.	Is waste transported offsite for disposal?	
	In landfills?	
	In incinerators?	
	Transfer Stations?	
-	Recycling plant?	N.
5	. Does the facility dispose of ash residue or sludge: Offsite?	
,	Onsite?	No
6	Does the facility receive refuse from outside the United States?	,
	If YES, is laboratory testing performed?	Nin
7	7. Does the facility operate battery shops, including charging areas within vehicle maintenance facilities?	*
	If YES, how many?	

# Section 10. Storage Tank Management

Location	Substance		Capacity		
				<del></del>	
Does the fac	ility have any U	JSTs?		<del></del>	
Location	Quantity	Size	Material Stored	Permitted	
				**	
	<del></del>				
(Attach a se	parate inventor	y sheet if i	necessary)		
Does the fac	cility have any l	USTs out-	of-service or abando	ned?	

Sec	tion 11. Toxic Substances Management	. 1
1.	Has the facility conducted a survey for PCBs?	No
2.	Are PCBs or PCB-contaminated oils in use or stored at the facility in:	No
	Transformers Capacitors Electromagnets Heat Transfer or Hydraulic Systems Circuit Breaker Fluorescent Light Ballasts Other	<b>a</b> (
3.	- A service and a service and a service	10
4.	Does the facility transport PCBs	No
5. 6. 7.	Does an Asbestos Management Plan exist?	No No No
8.	How long ago? No but laws (1154)  By contract or in-house?	Juted)
9.	Is there any asbestos on the facility that has been removed and is awaiting disposal?	g <u>- 1</u>
1	0. Will the facility have any demolition, remodeling, or renovation project underway at the time of the assessment?	s Ho
•	Please identify those projects and buildings.	

#### RESPONSE

- 11. Is asbestos material removed by contract or in-house personnel?
- 12. Does the facility monitor for radon gas?
- 13. Is there a program to reduce radon threat?
- 14. Has the facility populace been informed of the final status?
- 15. Is the facility performing any lead based paint removal?

No

<u> No</u> <u> No</u>

#### Section 12. Wastewater Management

	Does the facility have a National Pollutant Discharge Elimination System (NPDES) and/or State Pollutant Discharge Elimination System (SPDES)	No
	permit? Identify the types of discharges:	
	Stormwater runoff permits?	
	Drainage water from dredge and fill materials?	
	Wastewater treatment plant?	
	How many and what size?	
	Process wastewater?	
	Heat/Power production cooling blowdown water?	
	Stormwater runoff from fuel dispensing areas, airfields, and parking lots/aprons and maintenance facilities?	
	Vehicle wash facilities? How many?	
	Plating shops?	
	Does the facility maintain sedimentation holding ponds or	
	seepage pits from vehicle/aircraft washing, maintenance shop	
	drainage (shop operations and motor parks), and other activities?	
	Operate cooling towers and pass through water?	
	Septic Systems?	
	Fresh water wetlands? Industrial waste system/discharge?	•
	Lines which bypass treatment structures?	
	Other?	. [
2.	Does the facility discharges into a publicly owned treatment works (POTW) any of the following?	No
-	Process wastewater?	
	Domestic (sanitary) wastewater?	
	Industrial wastewater treatment plant effluent?	1
	Other?	110
3.	Are there any discharge bypass lines in the system?	<u> 40</u>
		4
4.	Does the facility have any sludge disposal areas from vehicles/equipment washing operations?	No.
	Is the sludge analyzed or characterized on a scheduled frequency prior to disposal?	
5	. What percent of vehicle maintenance is performed by contract?	
	Is it performed onsite or offsite?	
	No Vehicles	

#### Section 13. Water Quality Management

Signature of individual completing this form:

		and the vitter County transport	_
W Spra	1.	Does the facility operate a public drinking water system?  Girl Scouts have a day comp  ch Some Symmus sels maximum  on property questionable it it  Does the facility maintain wellheads?  Subsubset	on facolity  I week use per  Ho year
		Does the facility operate an underground injection well?	No
	4.	Are there groundwater aquifers on the facility?	2
	5.	Are they in use?  Is the facility located on a sole source aquifer?	3
	6.	Are protective or preventative measures in place to prevent contamination of these aquifers?	. <u>Ho</u>
	7.	Are field water purification units used?	Mo
		How is the backwash managed from these mobile units?	
		D V h	

كريملك

Girl scouts have a day camp on the facility which some summers gets maximum 1 week use. There is spring on property with concrete tile. This water source is not used for potable water. Girl scouts arrange for National Guard to supply water buffalo

# APPENDIX B: Special Emphasis Areas List

To Basin Manager, NRB, TRB, MRB, UCRB

We have identified a few environmental compliance issues that will be emphasized during the upcoming FY 97 ERGO external assessment. These special emphasis areas include:

- Ozone depleting substances

  Review elimination plan and status of funding.
- Pollution Prevention Plan Check Basin strategies and project waste reduction worksheets.
- Hazardous waste manifest training Check to see if project employees have completed training and are designated.
- Very small systems operator training (water supply wells)
   Check to see if project staff meets current training requirements.
- Annual mock training for spill plans
  Review schedule of annual mock spill training exercises.
- Acquisition of spill materials

  Check to see if project spill materials are consistent with spill plan.
- Review of ASTs and USTs
   Check current tank status and review specs to meet EPA's spill, overflow and corrosion protection regulations.
- Underground injection control wells (UIC).
   Check to see that floor drains have been permanently sealed or connected to the septic system.
- Clean Air Act Title V permits

  Review calculations for determining the need for a permit.

Please provide any available documentation that you may have concerning these subjects with your completed Pre-Visit Questionnaire (PVQ). If you have already returned your PVQ to New England Division, we will look for the necessary information during the site visit.

Jeff Deyette Operations Technical Support Division

# APPENDIX C: Figures

